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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

	X	
IN RE:	:	CHAPTER 11
Delphi Corporation, et al.,	: :	
Debtors.	: : X	CASE NO. 05-44481(RDD)

## SBC GLOBAL SERVICES' RESPONSE TO DEBTORS' NINTH OMNIBUS CLAIMS OBJECTIONS PURSUANT TO 11 U.S.C. § 502(b) AND FED. R. BANKR. P. 3007

SBC Global Services ("SBC") hereby submits this Response to Debtors' Ninth Omnibus Claims Objections Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007, and in support thereof, states as follows:

- 1. On or about October 8 and 14, 2005, Delphi Corporation and certain of its subsidiaries and affiliates (collectively, the "Debtors") filed voluntary petitions in this Court for reorganization relief under Chapter 11 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330.
- 2. SBC is engaged in the business of, *inter alia*, leasing equipment and providing services related thereto. SBC filed its proof of claim in this matter on or about July 31, 2006, on the basis of an equipment and services lease between SBC and the Debtors.

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3. The lease at issue was part of a complex group of transactions pursuant to which a

large volume of paperwork was generated. Despite a diligent search, SBC was unable to locate

the Lease and attach it to its proof of claim.

4. In its Ninth Omnibus Objection to Claims, Debtors have objected to SBC's claim

because SBC has provided insufficient documentation to support the claim.

5. SBC is currently performing a diligent search of its records in an effort to locate

the lease between the parties and provide this Court with proper documentation thereof.

6. Once SBC locates the relevant documents, it will provide this Court with a

supplemental response sufficiently documenting the lease transaction and amounts due

thereunder.

Dated: Chicago, IL

March 15, 2007

O'ROURKE KATTEN & MOODY

By: /s/ Michael C. Moody, Esq.

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## **CERTIFICATE OF SERVICE**

I, Michael C. Moody, Esquire, do hereby certify that on the 15<sup>th</sup> day of March, 2007, a true and correct copy of SBC Global Services response to Debtors Ninth Omnibus Objection to claims were served electronically or via USPS, postage prepaid on the parties listed below:

Delphi Corporation Attn. Corporate Counsel 5725 Delphi Drive Troy, MI 48098

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Dated: Chicago, IL March 15, 2007

## O'ROURKE KATTEN & MOODY

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